

Robert Delicate (RD-7363)
HARWOOD LLOYD, LLC
Attorneys for Defendants Daniel Stephens and Putnam County
350 5th Avenue, 59th Floor, Empire State Building
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(201)-359-3530

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEFFREY DESKOVIC

Plaintiff,

-against-

CITY OF PEEKSKILL, PUTNAM
COUNTY, WESTCHESTER COUNTY,
DAVID LEVINE, THOMAS MCINTYRE,
WALTER BROVARSKI, EUGENE
TUMOLO, JOHN AND JANE DOE
SUPERVISORS, DANIEL STEPHENS,
LOUIS ROH, MILLARD HYLAND, PETER
INSERO, and LEGAL AID SOCIETY OF
WESTCHESTER COUNTY

Defendants.

**DECLARATION OF
ROBERT DELICATE**

No. 7:07-cv-8150 (KMK) (GAY)

ECF Case

LINDA MCGARR

Plaintiff,

-against-

CITY OF PEEKSKILL, PUTNAM
COUNTY, WESTCHESTER COUNTY,
DAVID LEVINE, THOMAS MCINTYRE,
WALTER BROVARSKI, EUGENE
TUMOLO, JOHN AND JANE DOE
SUPERVISORS, DANIEL STEPHENS,
LOUIS ROH, MILLARD HYLAND

Defendants.

No. 7:07-cv-09488 (KMK) (GAY)

ECF Case

ROBERT L. DELICATE, an attorney duly admitted to practice law in the
Southern District of New York hereby affirms the following under the penalties of

perjury:

1. I am an associate in the law firm of Harwood Lloyd, LLC, attorney for the Defendant, Daniel Stephens and Putnam County. I submit this Declaration in support of Defendant, Daniel Stephens' and Putnam County's Motion for Summary Judgment.


2. Annexed hereto are the following exhibits:

- A. Plaintiff's Third Amended Complaint;
- B. Answer to Plaintiff's Third Amended Complaint;
- C. Excerpts from Plaintiff's Exhibit 1;
- D. Excerpts from the deposition of Plaintiff, Jeffrey Deskovic;
- E. Excerpts from the 50-h hearing of Jeffrey Deskovic;
- F. Excerpts from the sentencing of Jeffrey Deskovic;
- G. Excerpts from the deposition of Dan Stephens;
- H. Excerpts from the trial testimony given by Dan Stephens;
- I. Excerpts from the deposition of George Bolen;
- J. Excerpts from the deposition of Thomas McIntyre;
- K. Transcribed conversation from January 10, 1990 between Jeffrey Deskovic and David Levine;
- L. Plaintiff's pre-motion letter dated April 27, 2011;
- M. Excerpts from plaintiff's Exhibit 1, relating to the polygraph examination conducted on January 25, 1990.

Dated: New York, New York
August 5, 2011

YOURS, etc.,

HARWOOD LLOYD, LLC

By: 

Robert Delicate (RD-7363)
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